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4			
5	Attorney for Defendant		
6	SANDŘA LE		
7	UNITED STATES DISTRICT COURT		
8	NORTHERN DISTRICT OF CALIFORNIA		
9			
10	UNITED STATES OF AMERICA,	Case No. CR 21-00331 WHO	
11	Plaintiff,	STIPULATION AND [PROPOSED] ORDER CONTINUING STATUS	
12	v.	HEARING, EXCLUDING TIME AND EXTENDING THE DEADLINES UNDER	
13	SANDRA LE,	THE SPEEDY TRIAL ACT	
14	Defendant.		
15			
16	It is stipulated by and between counsel for the United States and counsel for the		
17	defendant, Sandra Le, that the status conference scheduled for September 16, 2021 at 1:30 PM		
18	before the Hon. William H. Orrick be vacated and rescheduled for October 28, 2021 at 1:30 PM.		
19	The reasons for this request are as follows:		
20	1. The defendant appeared before the Honorable Joseph C. Spero on August 31, 2021 for her		
21	initial appearance on the Indictment. Dkt. 3.		
22	2. Ms. Le then appeared before the Honorable Sallie Kim on September 15, 2021 for		
23	identification of counsel and a status conference. Dkt. 10. At this hearing, defense counsel made		
24	a general appearance on behalf of Ms. Le. The government then informed the Court that they		
25	would provide defense counsel discovery later this week in light of their representation. At this		
26	time, defense counsel has not yet received discovery.		
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1	Based on the foregoing, the parties stipulate and agree that excluding time from	
2	September 16, 2021 until October 28, 2021 will allow for the effective preparation of counsel.	
3	See 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice	
4	served by excluding the time from September 16, 2021 until October 28, 2021 from computation	
5	under the Speedy Trial Act outweigh the best interests of the public and the defendant in a	
6	speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).	
7	Undersigned defense counsel certifies that she obtained approval from the Assistant	
8	United States Attorney to file this stipulation and proposed order.	
9	IT IS SO STIPULATED	
10	II IS SO SIII CLAIED	
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13		
14	DATED: September 15, 2021 By:/s/	
15	Ashley Riser Counsel for SANDRA LE	
16		
17	DATED: September 15, 2021 UNITED STATES ATTORNEY'S OFFICE	
18	CIVILD STATES ATTORIVET S OFFICE	
19	By:/s/	
20	KENNETH CHAMBERS	
21	Attorneys for Plaintiff UNITED STATES OF AMERICA	
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[PROPOSED] ORDER

Based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court vacates the status conference scheduled for September 16, 2021 at 1:30 P.M. and reschedules it for October 28, 2021 at 1:30 P.M. The Court further finds that failing to exclude the time from September 16, 2021 through October 28, 2021 would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from September 16 through October 28, 2021 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial.

Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from September 16, 2021 through October 28, 2021 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

DATED:

HON. WILLIAM H. ORRICK United States District